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6	Attorneys for Defendant Expedia, Inc.		
7	UNITED STATES DISTRICT COURT		
8	DISTRICT OF NEVADA		
9	TALITHA SMITH,	Case No. 2:20-cv-02058-KJD-NJK	
	Plaintiff,		
10	vs.	STIPULATION AND REQUEST FOR EXTENSION OF TIME FOR	
11	EXPEDIA, INC. d/b/a CLASSIC VACATIONS, LLC; DOES I-X, inclusive; and	DEFENDANT EXPEDIA, INC. TO	
12	ROE CORPORATIONS I-X, inclusive.	RESPOND TO COMPLAINT AND/OR FILE DISMISSAL PAPERS	
13	Defendants.	(Third Request)	
14	The Parties by and through their respective	ve counsel of record stimulate and request that this	
15	The Parties, by and through their respective counsel of record, stipulate and request that this Court further extend the time for Defendant Expedia, Inc. d/b/a Classic Vacations, LLC (hereinafte		
16			
17	2021. In support of this Stipulation and Request, the parties state as follows:		
18	1. Plaintiff served Defendant Expedia with a copy of the Summons and Complaint on		
19	February 4, 2021. The original deadline for Expedia to respond to Plaintiff's Complaint was Thursday		
20	February 25, 2021.		
21	2. On February 18, 2021, the parties submitted a Stipulation and Order to extend the time		
22	for Expedia to respond to Plaintiff's Complaint until March 12, 2021 (First Request) while the parties		
23	continued early settlement discussions. (ECF No. 7) The court approved that extension on Februar		
	19, 2021. (ECF No. 8) On March 9, 2021, t	he court approved the parties' second requested	
24			

Stipulation and Order seeking an extension to April 2, 2021 for Expedia to respond to Plaintiff's Complaint while the parties continued settlement discussions. (ECF No. 10)

- The parties have now reached a resolution of this matter, and are in the process of exchanging settlement documents. Once those documents have been executed, the parties intend to file a Stipulation and Order for Dismissal with Prejudice with the court. As a result, the parties believe it would be prudent to extend the time for Expedia's response to the Complaint, with the understanding that the parties anticipate filing dismissal papers with the court by the requested extended deadline in lieu of a responsive pleading.
- This is the third request for an extension of time for Defendant Expedia to respond to Plaintiff's Complaint, and is not sought for any improper purpose or other reason of delay. This extension is sought only to secure sufficient time for the parties to review and execute settlement documents and file dismissal papers with the court.

WHEREFORE, the parties respectfully request that Defendant Expedia be permitted a further extension of time, up to and including April 30, 2021, to respond to Plaintiff's Complaint and/or file dismissal papers with the court.

By:

DATED this 1st day of April 2021.

HOLMAN LAW OFFICE

KAMER ZUCKER ABBOTT

/s/ Scott M. Abbott

By:	/s/ Kṛnstīna S. Holman	
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Attorney for Plaintiff

Attorneys for Defendant Expedia

**ORDER** 

IT IS SO ORDERED.

 $_{
m DATED:}$  April 2, 2021

UNITED STATES MAGISTRATE JUDGE

KAMER ZUCKER ABBOTT Attorneys at Law